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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JAHOVA BELL,
Defendant.

CASE NO: **2:24-cr-00075-JAD-DJA-3**

**STIPULATION TO CONTINUE
ARRAIGNMENT AND PLEA HEARING**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by JAHOVA BELL, by and through his attorney, RACHAEL E. STEWART, ESQ., and the United States of America, by and through JASON M. FRIERSON, United States Attorney for the District of Nevada, and DANIEL J. COWHIG, Assistant United States Attorney, that the arraignment and plea hearing scheduled for April 16, 2024, be continued to April 26, 2024, if that date is available to the Court.

The request for a continuance is based upon the following:

1. The arraignment is currently scheduled for April 16, 2024. Counsel for Mr. Bell has an unavoidable pre-existing conflict on that date that cannot be rescheduled. After conferring with Counsel for the Government and court staff, the parties request that the arraignment and plea be rescheduled to April 26, 2024.
2. The Government has no objection to the continuance.

3. Mr. Bell is not in custody, and he does not object to the continuance.
4. The additional time sought herein is not sought for the purposes of delay.
5. Denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
6. This is the first request to continue defendant Bell's arraignment filed herein.

DATED: April 11, 2024

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Rachael E. Stewart
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/s/ Daniel J. Cowhig
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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ORDER

(First Request)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

1. The arraignment is currently scheduled for April 16, 2024. Counsel for Mr. Bell has an unavoidable pre-existing conflict on that date that cannot be rescheduled. After conferring with Counsel for the Government and court staff, the parties request that the arraignment and plea be rescheduled to April 26, 2024.
2. The Government has no objection to the continuance.
3. Mr. Bell is not in custody, and he does not object to the continuance.
4. The additional time sought herein is not sought for the purposes of delay.

6. This is the first request to continue defendant Bell's arraignment filed herein.

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the defendant sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

DATED this 12th day of April, 2024.

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